

Baton Rouge Polyolefins Plant
12875 Scenic Highway (70807)
P. O. Box 53006
Baton Rouge, LA 70892-3006



CERTIFIED MAIL -

February 21, 2019

**ExxonMobil Baton Rouge Polyolefins Plant
ExxonMobil Chemical Company Flare Consent Decree
Semi-Annual Report**

Director, Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Mail Code 2242-A
1200 Pennsylvania Ave., N.W.
William Jefferson Clinton Building
Room 1119
Washington, D.C. 20460-0001

Associate Director
Air, Toxics, and Inspections Coordination Branch (6 EN-A)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, Texas 75202

Attention: Consent Decree, Civil Action No. 4:17-cv-3302

Pursuant to Section X, Paragraphs 66-73 of Consent Decree, Civil Action No. 4:17-cv-3302, Exxon Mobil Corporation (ExxonMobil) submits this Semi-Annual Report (SAR) covering the period of June 6, 2018 through December 31, 2018.

Certification Statement
Per Consent Decree Paragraph 71:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

February 21, 2019

Page 2 of 2

If you have any questions about this SAR or require any additional information, please contact George W. Jones at (225) 977-9795.

Sincerely,



Stephen J. Hamilton
Baton Rouge Polyolefins Plant Manager
ExxonMobil Baton Rouge Polyolefins Plant

Attachment

cc: EES Case Management Unit
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044-7611
Re: DJ # 90-5-2-1-10128 and 10128/1

United States Attorney
Southern District of Texas
Andrew A. Bobb
Assistant U.S. Attorney
1000 Louisiana St., Suite 2300
Houston, TX 77002

Celena J. Cage
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Baton Rouge Polyolefins Plant

Baton Rouge, Louisiana

**SEMI-ANNUAL REPORT
PURSUANT TO CONSENT DECREE,
*UNITED STATES, ET AL V. EXXON MOBIL CORPORATION
AND EXXONMOBIL OIL CORPORATION,*
CIVIL ACTION NO. 4:17-cv-3302 (S.D. TX)**

June 6, 2018 – December 31, 2018

12875 Scenic Highway

Baton Rouge, Louisiana

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SECTION 1 STATUS OF CONSENT DECREE SECTION V COMPLIANCE REQUIREMENTS

This progress report provides the status of implementation of Consent Decree requirements that, during the reporting period, require the ExxonMobil Baton Rouge Polyolefins Plant to undertake a specific action or make a submittal to an agency; or otherwise require the ExxonMobil Baton Rouge Polyolefins Plant to take specific steps to implement new obligations, including new control or emissions requirements, new monitoring requirements, or institution of new procedures. Once the ExxonMobil Baton Rouge Polyolefins Plant has reported a requirement as implemented, it will not appear in subsequent progress reports under this subparagraph.

Consent Decree Paragraph 66a. – b.

a. A description of the status of work performed and progress made toward implementing all requirements of Consent Decree Section V (Compliance Requirements) at the Covered Facilities. This topic should describe any major milestones completed and remaining to be completed;

ExxonMobil Baton Rouge Polyolefins Plant has completed the following work required to meet the requirements of Consent Decree Section V Compliance Requirements. Major milestones for this reporting period are in Table 1.1.

TABLE 1.1 Major Milestones Completed For This Reporting Period

Covered Flare	Description of Work Completed During This Reporting Period
None	None

ExxonMobil Baton Rouge Polyolefins Plant is in the process of completing the following work as required to meet the requirements of Consent Decree Section V Compliance Requirements.

TABLE 1.2 Status of Remaining Work to be Completed

Applicability	Remaining Work To Be Completed	Anticipated Completion Date
Flare S-1301, Flare S-4001	Submit Flare Data and Monitoring Systems and Protocol Report	No later than 6/6/2019
Flare S-1301, Flare S-4001	Submit Initial Waste Gas Minimization Plan	No later than 6/6/2019

Flare S-1301, Flare S-4001	Conduct internal reporting and recordkeeping for Reportable Flaring Incidents	No later than 6/6/2019
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b. A description of any problems encountered or anticipated in meeting the requirements in Consent Decree Section V (Compliance Requirements) at the Covered Facilities, together with implemented or proposed solutions;

ExxonMobil Baton Rouge Polyolefins Plant has not encountered nor anticipates problems in meeting the requirements of Consent Decree Section V Compliance Requirements as shown in Table 1.3.

TABLE 1.3 Encountered or Anticipated Problems In Work To be Completed

Covered Flare	Encountered or Anticipated Problem(s)	Proposed or Implemented Solution(s)
None	None	None

SECTION 2 STATUS OF CONSENT DECREE SECTION V REPORTING REQUIREMENTS

Below is a summary of the status of reports as required under Consent Decree Section V.

Flare Data and Monitoring Systems and Protocol Report

Requirement: CD Paragraph 18

Description: For each Covered Flare, by no later than 365 Days after the Effective Date, the Defendants must submit a report, consistent with the requirements in Appendix 1.5, to EPA that includes the following:

- a. The information, diagrams, and drawings specified in Paragraphs 1–7 of Appendix 1.5;
- b. A detailed description of each instrument and piece of monitoring equipment, including the specific model and manufacturer, that the Defendants have installed or will install in compliance with Paragraphs 20–24 of this Consent Decree (Paragraphs 8–9 of Appendix 1.5); and
- c. A narrative description of the monitoring methods and calculations that the Defendants will use to comply with the requirements of Paragraph 43 (Paragraph 10 of Appendix 1.5).

Status: This section does not apply to this semi-annual reporting period. The Flare Data and Monitoring Systems and Protocol Report is due no later than June 6, 2019.

Initial Waste Gas Minimization Plant (“Initial WGMP”)

Requirement: CD Paragraph 29

Description: By no later than 365 Days after the Effective Date, for each Covered Flare, the Defendants must submit to EPA an Initial Waste Gas Minimization Plan that discusses and evaluates flaring Prevention Measures on both a facility-wide and Covered Flare-specific basis for each Covered Facility.

Status: This section does not apply to this semi-annual reporting period. The Initial Waste Gas Minimization Plan is due no later than June 6, 2019.

First Updated Waste Gas Minimization Plant (“First Updated WGMP”)

Requirement: CD Paragraph 29

Description: By no later than 730 Days after the Effective Date, the Defendants must submit to EPA a First Updated WGMP that updates, if and as necessary, the information, diagrams, and drawings required in the Flare Data and Monitoring Systems and Protocol Report required by Paragraph 18 and the information required in sub-Paragraphs 29.a–29.e for the 12-month period after the period covered by the Initial Waste Gas Minimization Plan.

Status: This section does not apply to this semi-annual reporting period. The first Updated Waste Gas Minimization Plan is due no later than June 5, 2020.

SECTION 3 STATUS OF PERMITTING ACTIVITY

Consent Decree Paragraph 66c.

c. A description of the status of any permit applications, including a summary of all permitting activity, pertaining to compliance with this Consent Decree;

Prior to permit submittals, ExxonMobil Chemicals Baton Rouge Area Operations met with the Louisiana Department of Environmental Quality (LDEQ) to discuss how applicable requirements would be incorporated into the Title V permits. ExxonMobil Baton Rouge Polyolefins Plant is preparing to submit a permit application to LDEQ's consolidated preconstruction and Title V CAA permitting program for Permit 0840-00003-V7. The application will request to incorporate the requirements listed in the Consent Decree sub-Paragraph 60.c into Permit 0840-00003-V7 such that the requirements will (i) become and remain "applicable requirements" as that term is defined in 40 C.F.R §70.2 and (ii) survive the termination of the Consent Decree. In accordance with Consent Decree Paragraph 60.b., the permit applications will be submitted no later than one year after the Effective Date or one year after the respective deadline for the Compliance Requirements listed in Paragraph 60.a.

SECTION 4 REPORTS SUBMITTED TO LDEQ

Consent Decree Paragraph 66d.

- d. A copy of any reports that were submitted only to LDEQ and that pertain to compliance with this Consent Decree.

Status: ExxonMobil Baton Rouge Polyolefins Plant is providing reports that may pertain to compliance with this Consent Decree and that were submitted only to LDEQ in Attachment A.

SECTION 5 STATUS OF SEP(S)

Consent Decree Paragraph 66e.

e. A description of the Defendants' progress in satisfying its obligations in connection with the SEP(s) under Section VI including, at a minimum, a narrative description of activities undertaken; status of any construction or compliance measures, including the completion of any milestones set forth in the SEP Work Plan (attached as Appendix 2.1), and a summary of costs incurred since the previous report;

Refer to Semi-Annual Report submitted by ExxonMobil Baytown Chemical Plant for status of Federal Supplemental Environmental Project (SEP).

Refer to Semi-Annual Report submitted by the ExxonMobil Baton Rouge Chemical Plant for status of Louisiana Beneficial Environmental Projects (BEPs).

SECTION 6 UPDATED WASTE GAS MINIMIZATION PLAN (WGMP)

Consent Decree Paragraph 66f

f. Any updated WGMP for the Covered Facilities that is required to be submitted by Paragraph 31.

Subsequent Updates to WGMPs (“Subsequently Updated WGMP”)

Requirement: CD Paragraph 31

On an annual basis after submitting the First Updated WGMP until termination of the Decree, the Defendants must submit an updated WGMP for a Covered Facility as part of the Semi-Annual Report required by Section IX (Reporting Requirements) if, at that Covered Facility, the Defendants: a) commence operation of a Newly Installed Covered Flare or permanently remove a Covered Flare from service, b) connect a new Waste Gas stream to a Covered Flare, c) intentionally modify the Baseload Waste Gas Flow Rate to a Covered Flare, d) install additional FGRS, or e) change the design of a Covered Flare. Each update must update, if and as necessary, the information required in sub-Paragraphs 29.a.i - 29.a.iii. Each update must update, if and as necessary, the information required in sub-Paragraphs 30.a and 30.b. To the extent the Defendants propose to extend any schedule set forth in a previous WGMP for any of the Covered Facilities, the Defendants may do so only with good cause, the determination of which is subject to Section XII (Dispute Resolution).

This section does not apply to this semi-annual reporting period. The Initial Waste Gas Minimization Plan is due no later than June 6, 2019 and the first Updated Waste Gas Minimization Plan is due no later than June 5, 2020.

SECTION 7 SUMMARY OF INTERNAL FLARING INCIDENT REPORTS

Consent Decree Paragraph 66g.

- g. Any summary of internal flaring incident reports as required by Paragraph 34.

This section does not apply to this semi-annual reporting period. In accordance with Paragraph 34.a. of the Consent Decree, ExxonMobil Baton Rouge Polyolefins Plant will begin internal Reportable Flaring Incident (RFI) reporting and recordkeeping on June 6, 2019.

SECTION 8 REPORTING SUMMARY

Consent Decree Paragraph 66h.

- h. A summary of the following, per Covered Flare per Calendar Quarter (hours shall be rounded to the nearest tenth):
- (1) The total number of hours of Instrument Downtime claimed pursuant to Paragraph 45, expressed as both an absolute number and a percentage of time the Covered Flare that the instrument/equipment monitors is In Operation and Capable of Receiving Sweep, Supplemental, and/or Waste Gas;

TABLE 8.1 June 6th – June 30th, 2018 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Flare S-1301	Vent Gas Flow	0.0	0.0
Flare S-1301	Vent Gas Heating Value	0.0	0.0
Flare S-1301	Ring Steam Flow	0.0	0.0
Flare S-1301	Flare Cameras	0.0	0.0
Flare S-4001	Vent Gas Flow	0.0	0.3
Flare S-4001	Vent Gas Heating Value	0.2	1.3
Flare S-4001	Ring Steam Flow	0.0	0.0
Flare S-4001	Center Steam Flow	0.0	0.0
Flare S-4001	Flare Cameras	0.0	0.0

TABLE 8.2 3rd Quarter 2018 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Flare S-1301	Vent Gas Flow	0.5	11.0
Flare S-1301	Vent Gas Heating Value	2.5	54.8

Flare S-1301	Ring Steam Flow	0.1	3.0
Flare S-1301	Flare Cameras	0.0	0.1
Flare S-4001	Vent Gas Flow	0.4	8.5
Flare S-4001	Vent Gas Heating Value	0.0	0.3
Flare S-4001	Ring Steam Flow	0.1	1.5
Flare S-4001	Center Steam Flow	0.0	1.0
Flare S-4001	Flare Cameras	0.1	1.2

TABLE 8.3 4th Quarter 2018 Instrument Downtime Summary

Covered Flare	Monitoring System	System Downtime (%)	System Downtime (hours)
Flare S-1301	Vent Gas Flow	0.0	0.0
Flare S-1301	Vent Gas Heating Value	0.2	4.0
Flare S-1301	Ring Steam Flow	0.3	6.5
Flare S-1301	Flare Cameras	0.0	0.0
Flare S-4001	Vent Gas Flow	0.0	0.0
Flare S-4001	Vent Gas Heating Value	0.2	3.5
Flare S-4001	Ring Steam Flow	0.0	0.0
Flare S-4001	Center Steam Flow	0.0	0.0
Flare S-4001	Flare Cameras	0.2	3.9

- (2) If the total number of hours of Instrument Downtime claimed pursuant to Paragraph 45 exceeds 5% of the time in a Calendar Quarter the Covered Flare affected by the downtime is In Operation, an identification of the periods of downtime by date, time, cause (including Malfunction or maintenance), and, if the cause is asserted to be a Malfunction, the corrective action taken;

Status: No Covered Flare incurred Instrument Downtime claimed pursuant to Paragraph 45 that exceeded 5% of the time the flare was In Operation in any Calendar Quarter, as noted by “None” in Tables 8.4 – 8.6.

TABLE 8.4 June 6th – June 30th 2018 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

TABLE 8.5 3rd Quarter 2018 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

TABLE 8.6 4th Quarter 2018 Instrument Downtime Identification (if total hours exceeds 5%)

Covered Flare	Monitoring System	Start Date/Time	End Date/Time	Cause	Corrective Action
None	None	None	None	None	None

- (3) The total number of hours, expressed as both an absolute number of hours and a percentage of time that the Covered Flare was In Operation, in which the requirements of Paragraphs 43-44 were not applicable because the only gas or gases being vented were Pilot Gas or Purge Gas;

TABLE 8.7 June 6 – June 30, 2018 Requirements of Paragraphs 43-44 were Not Applicable Because Only Pilot or Purge Gas Flow

Covered Flare	Time (%)	Time (Hours)
Flare S-1301	0.0	0.0
Flare S-4001	0.0	0.0

TABLE 8.8 3rd Quarter 2018 Requirements of Paragraphs 43-44 were Not Applicable Because Only Pilot or Purge Gas Flow

Covered Flare	Time (%)	Time (Hours)
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Flare S-1301	0.0	0.0
Flare S-4001	0.0	0.0

TABLE 8.9 4th Quarter 2018 Requirements of Paragraphs 43-44 were Not Applicable Because Only Pilot or Purge Gas Flow

Covered Flare	Time (%)	Time (Hours)
Flare S-1301	0.0	0.0
Flare S-4001	0.0	0.0

(4) Exceedances of Combustion Efficiency Standards.

- i. The total number of hours, expressed as both an absolute number of hours and a percentage of time the Covered Flare was In Operation, of exceedances of the emissions standards in Paragraphs 43-44; provided however, that if the exceedance of these standards was less than 5% of the time in a Calendar Quarter and was due to one or more of the exceptions set forth in Paragraph 45, the report shall so note; and

Status: No exceedance of combustion efficiency standards was due to one or more of the exceptions set forth in Paragraph 45, as noted by “None” in Tables 8.10 – 8.12.

TABLE 8.10 June 6 – June 30, 2018 Exceedance of Standard less than 5% of the Time in this Period and Was Due to Exceptions Set Forth in Paragraph 45

Covered Flare	Time (%)	Time (Hours)
None	None	None

TABLE 8.11 3rd Quarter 2018 Exceedance of Standard less than 5% of the Time in this Period and Was Due to Exceptions Set Forth in Paragraph 45

Covered Flare	Time (%)	Time (Hours)
None	None	None

TABLE 8.12 4th Quarter 2018 Exceedance of Standard less than 5% of the Time in this Period and Was Due to Exceptions Set Forth in Paragraph 45

Covered Flare	Time (%)	Time (Hours)
None	None	None

ii. If the exceedance of the emissions standards in Paragraphs 43-44 was not due to one of the exceptions in Paragraph 45 (Instrument Downtime), or if the exceedance was due to one or more of the exceptions in Paragraph 45 and the total number of hours caused by the exceptions exceeds 5% of the time in a Calendar Quarter that the Covered Flare affected by the Instrument Downtime was In Operation, an identification of each block period that exceeded the standard, by time and date; the cause of the exceedance (including startup, shutdown, maintenance, or Malfunction), and if the cause is asserted to be a Malfunction, an explanation and any corrective actions taken; and

Status: There were no exceedances of combustion efficiency standards, as noted by “None” in Tables 8.13 - 8.15.

TABLE 8.13 June 6 – June 30, 2018 Exceedance of Combustion Efficiency Standards

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
None	None	None	None	None	None

TABLE 9.14 3rd 2018 Quarter Exceedance of Combustion Efficiency Standards

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
None	None	None	None	None	None

TABLE 9.15 4th 2018 Quarter Exceedance of Combustion Efficiency Standards

Covered Flare	Combustion Efficiency Standard	Start Date/ Time	End Date/ Time	Cause	Corrective Action
None	None	None	None	None	None

- (5) Compliance with Compressor Availability Requirements. Sufficient information to document compliance with the FGRS Compressor availability requirements of sub-Paragraph 38.b. For any period of non-compliance, the Defendants must identify the date, cause, and corrective action taken.

This section does not apply to the ExxonMobil Baton Rouge Polyolefins Plant.

SECTION 9 ADDITIONAL MATTERS

Consent Decree Paragraph 66i.

- i. Any additional matters that the Defendants believe should be brought to the attention of EPA, or LDEQ for the Baton Rouge Facilities.

Status: None.

SECTION 10 FENCELINE AIR MONITORING REPORTS

Consent Decree Paragraph 67 a. – b.

The Defendants must submit Fenceline Air Monitoring Reports as part of each Semi-Annual Report. The Fenceline Air Monitoring Reports must contain the following information:

- a. In spreadsheet format, the individual sample results for each monitor comprising each Fenceline Monitoring System, each bi-weekly annual average benzene concentration difference value (once annual averages are available), and the corresponding meteorological data for the relevant monitoring periods. The first two columns of each spreadsheet shall be the date and time for each sample taken; and
- b. A detailed description of the actions and findings of any root cause analysis and corrective action(s) undertaken pursuant to Paragraph 3(g) of Appendix 2.2, including the known results of the corrective action(s) and the anticipated emissions reductions (in TPY per pollutant).

This section does not apply to the ExxonMobil Baton Rouge Polyolefins Plant.

SECTION 11 ANNUAL EMISSION DATA

Consent Decree Paragraph 68

In the Semi Annual Report that is submitted on February 28 of each year, the Defendants must provide, for each Covered Flare, for the prior calendar year, the amount of emissions of the following compounds (in tons per year): VOCs, HAPs, NO_x, CO₂, methane, and ethane.

As of the date of this Semi-Annual Report, the annual emissions are reflected in Table 11.1 below.

TABLE 11.1 2018 Annual Emissions Data

Covered Flare	Emissions, tons per year					
	VOCs	HAPs	NO _x	CO ₂	Methane	Ethane
Flare S-1301	18	< 1	9	20,714	8	< 1
Flare S-4001	12	< 1	10	22,000	9	< 1

SECTION 12 ANY ADDITIONAL NON-COMPLIANCE

Consent Decree Paragraph 69

Each Semi-Annual Report must also include a description of any non-compliance with the requirements of this Consent Decree not otherwise identified by Paragraph 66 along with an explanation of the violation's likely cause and of the remedial steps taken, or to be taken, to prevent or minimize such violation. If the cause of a violation cannot be fully explained at the time the report is due, the Defendants must so state in the report. In such a case, the Defendants must investigate the cause of the violation and then submit an amendment to the report, including a full explanation of the cause of the violation, within 30 Days of the Day the Defendants become aware of the cause of the violation. Nothing in this Paragraph or the following Paragraph relieves the Defendants of their obligation to provide the notice required by Section XI (Force Majeure).

TABLE 12.1 Additional Non-Compliance

Covered Flare	Requirement Paragraph	Start Date/ Time	End Date/ Time	Cause	Corrective Action
Flare S-4001	39.b No Visible emissions	9/24/2018 17:11	9/24/2018 17:34	Loss of steam from Boiler C Trip	Increased steam from idle Boiler

ATTACHMENT A

Baton Rouge Polyolefins Plant
12875 Scenic Highway (70807)
P. O. Box 53006
Baton Rouge, LA 70892-3006

LEDEQ RECEIPT

2018 SEP 21 PM 4: 52

ExxonMobil
Chemical

September 21, 2018

Louisiana Department of Environmental Quality
Office of Environmental Assessment
Post Office Box 4314
Baton Rouge, Louisiana 70821-4314

RE: NSPS Subpart DDD Semi-annual Report
Title V - Air Permit No. 0840-00003-V6
Agency Interest No. 3519

To Whom It May Concern:

In accordance with New Source Performance Standards (NSPS) 40 CFR 60.565(k) ExxonMobil BRPO hereby submits this semi-annual report covering the period from January 1, 2018 through June 30, 2018.

40 CFR 60.565(k)(2): *All periods recorded under §60.565(b) when the vent stream has been diverted from the control device.*

There were no periods recorded under §60.565(b).

40 CFR 60.565(k)(4): *All periods recorded under §60.565(e) in which the flare or pilot flame was absent.*

There were no periods recorded under §60.565(e).

40 CFR 60.565(k)(7): *Any change in process operations that increases the uncontrolled annual emissions or the VOC weight percent of the individual stream as recorded in §60.565(h).*

ExxonMobil BRPO has had no change in process operations that increased the uncontrolled annual emissions or the VOC weight percent of the applicable individual streams during this reporting period.

If any additional information is needed, please contact George Jones at (225) 977-9795.

Sincerely,



Stephen J. Hamilton
Plant Manager

Baton Rouge Polyolefins Plant
12875 Scenic Highway (70807)
P. O. Box 53066
Baton Rouge, LA 70892-3066

DEQ RECEIPT

2018 SEP 21 PM 4: 52

ExxonMobil
Chemical

September 21, 2018

Title V Program
Office of Environmental Compliance
Surveillance Division
Post Office Box 4312
Baton Rouge, LA 70821-4312

Re: ExxonMobil Chemical Company, Baton Rouge Polyolefins Plant (BRPO)
First Half Part 70 General Conditions K and R
Louisiana General Condition XI
Agency Interest Number 3519

To Whom It May Concern:

ExxonMobil Chemical, Baton Rouge Polyolefins Plant (BRPO), submits the attached semi-annual report as required by the above Part 70 General Conditions and the Louisiana General Condition XI of BRPO's approved Part 70 permit. This semi-annual report covers the period from January 1, 2018 through June 30, 2018. The attached tables reflect reported deviations from BRPO during this time period if applicable.

If you have any questions or require additional information please contact George Jones at (225) 977-9795.

I certify, under provisions of Louisiana and United States law which provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry the statements and information contained in this report are true, accurate and complete.

Sincerely,



Stephen J. Hamilton
Site Manager

cc: LA-DEQ, Capital Regional Office

Semi Annual Report
40 CFR 70.6(a)(3)(iii)(A),
Louisiana General Condition XI; Part 70 General Conditions K and R
ExxonMobil Chemical, Baton Rouge Polyolefins Plant

LA DEQ Agency Interest No: 3519

Site Wide Part 70 Permit Number	Date Issued	Reporting Period
0840-00003-V6 0840-00003-V7	March 01, 2015 March 21, 2018	January 1, – June 30, 2018

Required monitoring is identified in the “Specific Requirements” section of the above referenced part 70 Permit.

Any deviations from monitoring requirements as specified for the above reporting period as required by General Conditions K are noted in Table 1 below. Also listed in Table 1 are the items previously or currently being reported as permit deviations required by General Condition R.

Table 1 Reporting requirements per Part 70 General Conditions K & R

Date	Required Citation	Reference to Deviations Previously Reported Via Letters to DEQ dated:	Description
May 7, 2018	Smoking Flare [40 CFR 60.18)		C-boiler tripped due to a loose contactor in the electrical switch. The loss of C-boiler resulted in loss of steam to the flare.

Any deviations from emission limitations specified in the permit from the reporting period, as required by Louisiana General Condition XI, are noted in Table 2 below.

Table 2 Reporting requirements per LAC 33:III.537.XI.D

Description & Cause of Emission Exceedance	Duration of non-compliance	Steps taken to reduce or eliminate	Steps taken to prevent recurrence
none	*		

Note there were no permit limit exceedances during this event.